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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ENTROPIC COMMUNICATIONS,
LLC,

14 Plaintiff,

15 v.

16 DISH NETWORK CORPORATION,
17 *et al.*,

18 Defendants.
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Case No. 2:23-cv-1043-JWH-KES
(Lead Case)

**PLAINTIFF ENTROPIC
COMMUNICATIONS, LLC'S
APPLICATION TO FILE UNDER
SEAL ITS OBJECTIONS TO THE
SPECIAL MASTER REPORT AND
RECOMMENDATIONS ON
MOTIONS REFERRED BY THE
COURT ON FEBRUARY 9, 2024,
AND MARCH 26, 2024 (DKT. 446);
DECLARATION OF DOUGLAS
JORDAN WINNARD;
[PROPOSED] ORDER**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic”) hereby applies for an order sealing unredacted information referenced in Entropic’s Objections to the Special Master Report and Recommendations on Motions Referred by the Court on February 9, 2024, and March 26, 2024 (Dkt. 446) (“Objections”), which contains details related to, and terms of a confidential agreement between Entropic and MaxLinear, Inc. and MaxLinear Communications, LLC (collectively, “MaxLinear”).

Each portion of Entropic’s Objections referenced in the chart below reflects information contained in a confidential agreement between Entropic and MaxLinear, and has been the subject of prior applications to seal submitted in this action. (*See* Decl. of Douglas Jordan Winnard in Support of Entropic’s Application to File Document Under Seal (“Winnard Decl.”), ¶¶ 4–6.) Entropic, therefore, applies to file its Objections under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Objections to the Special Master Report and Recommendations (“Objections”) at 7:22, 7:23–26.	Terms of confidential agreement between Entropic and MaxLinear.
Portions of Entropic’s Objections at 9:5.	Terms of confidential agreement between Entropic and MaxLinear.
Portions of Entropic’s Objections at 11:22.	Terms of confidential agreement between Entropic and MaxLinear.

1 Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal its
2 Objections as described above. Under Rule 79-5.2.2(a), a party may seek leave to file
3 a document under seal so long as the Application describes the nature of the
4 information that should be closed to public inspection and is accompanied by: (1) a
5 declaration establishing good cause why the strong presumption of public access in
6 civil cases should be overcome and informing the Court whether anyone opposes the
7 Application; (2) a proposed order; (3) a redacted version of the relevant document;
8 and (4) an unredacted version of the relevant document. Entropic has complied with
9 these requirements. The information that Entropic seeks to seal is contained within a
10 confidential agreement between Entropic and MaxLinear. (Winnard Decl. ¶¶ 4, 5.)
11 The public does not have an interest in accessing this confidential information. (*Id.*
12 ¶ 4.) Additionally, Entropic's request is narrowly tailored to only prevent the public
13 from viewing confidential information. (*Id.*) Therefore, compelling reasons exist to
14 seal the highlighted portions of Entropic's Objections. *See Aya Healthcare Servs.,*
15 *Inc. v. AMN Healthcare, Inc.*, No. 17cv205-MMA (MDD), 2020 WL 1911502, at *5
16 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons exist to seal
17 references . . . to Defendants' proprietary business records that detail sensitive
18 financial terms, proprietary business strategies, and confidential negotiations and
19 agreements with third parties."); *Roberts v. Bloom Energy Corp.*, No. 19-cv-02935-
20 HSG, 2020 WL 6162117, at *4 (N.D. Cal. Oct. 21, 2020) (granting application to
21 seal information related to confidential third-party agreement).

22 Accordingly, Entropic respectfully requests that this Court order the
23 unredacted Objections to be filed under seal. Concurrent with this filing, Entropic
24 has filed a redacted version of its Objections with the Court, which only redacts
25 information necessary to protect confidential, private, and otherwise non-public
26 information therein.

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1 Dated: May 13, 2024

Respectfully submitted,

2 By: /s/ Douglas Jordan Winnard

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